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Attorneys for LIBERTY MUTUAL  
INSURANCE COMPANY

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

NICOL HAGGAR; individually,

Plaintiff,

v.

LIBERTY MUTUAL INSURANCE  
COMPANY and DOES I through X, inclusive,  
Defendants.

Case No. 2:24-cv-00167-APG-DJA

**STIPULATION AND ~~PROPOSED~~ ORDER  
TO EXTEND TIME FOR LIBERTY  
MUTUAL TO FILE RESPONSIVE  
PLEADING**

Defendant LIBERTY MUTUAL INSURANCE COMPANY (“Liberty Mutual”) and Plaintiff Nicol Hagggar (“Plaintiff”), by and through their counsel of record, hereby stipulate and agree as follows:

**WHEREAS**, this case was commenced in the Eighth Judicial District Court of Nevada, Clark County on November 30, 2023, less than one year from the time the Notice of Removal was filed by Liberty Mutual. [ECF No. 1-1];

**WHEREAS**, on January 25, 2024, Liberty Mutual filed a Petition for Removal to this Court [ECF No. 1];

**WHEREAS**, on January 30, 2024, this Honorable Court filed an Order to Show Cause to

Liberty Mutual, to show cause regarding subject matter jurisdiction. This deadline is February 12, 2024. [ECF No. 6];

**WHEREAS**, Defendant Liberty Mutual's deadline for their responsive pleading is currently February 2, 2024, and has not yet expired;

**WHEREAS**, as the deadline for Liberty Mutual to show cause is February 12, 2024, the parties request an extension to Liberty Mutual's responsive pleading deadline;

**NOW THEREFORE**, the Parties, by and through their undersigned counsel, hereby stipulate and agree as follows:

1. Liberty Mutual's deadline to file a responsive pleading will be extended by three weeks, from February 2, 2024 to **February 23, 2024**.

Dated: January 31, 2024

McCORMICK, BARSTOW, SHEPPARD,  
WAYTE & CARRUTH LLP

By: /s/ Stacy Norris

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Attorneys for Defendant

Dated: January 31, 2024

BOYACK LAW GROUP

By: /s/ Bryan A. Boyack

Bryan A. Boyack, Esq.  
Nevada Bar No. 9980  
Attorney for Plaintiff

**IT IS SO ORDERED:**

DATED: 2/1/2024



DANIEL J. ALBRECHTS  
UNITED STATES MAGISTRATE JUDGE